

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

LINDSEY GULDEN

and

DAMIAN BURCH,

Plaintiffs,

V.

EXXON MOBIL CORPORATION

Defendant.

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Civil Action No. 3:24-CV-07381-MAS-TJB

I, Beth E. Casteel, declare under penalty of perjury that the following is true and correct:

1. I currently work for Exxon Mobil Corporation (“ExxonMobil”) as the General Auditor. I have worked in this position since February 2020 and have been employed by ExxonMobil since June 1989.

2. Plaintiff Lindsey Gulden (“Gulden”) worked for ExxonMobil Upstream Integrated Solutions Company, an affiliate of ExxonMobil, which is a Delaware corporation with its principal place of business in Texas.

3. During her employment, Gulden resided in Texas.

4. Plaintiff Damian Burch (“Burch”) worked for ExxonMobil Global Projects, an affiliate of ExxonMobil, which is a Delaware corporation with its principal place of business in Texas.

5. During his employment, Burch resided in Texas.

6. ExxonMobil Technology & Engineering Company (“EMTEC”), an affiliate of ExxonMobil, is a Delaware corporation with its principal place of business in Texas. EMTEC employees are housed in a facility in Annadale, New Jersey.

7. Neither Gulden nor Burch ever worked for EMTEC.

8. It is my understanding that as part of the discovery process before the Office of Administrative Law Judges, Gulden’s and Burch’s disclosures identified themselves, and the ten individuals listed below, as people who are likely to have discoverable information.

- a. Melissa Bond is a current employee of ExxonMobil; she resides in Texas.
- b. Caroline Breaux is a current employee of ExxonMobil; she resides in Texas.
- c. I (Beth Casteel) am a current employee of ExxonMobil and reside in Texas.
- d. Scott Clingman is a current employee of ExxonMobil; he resides in Texas.
- e. Michael Deal is a current employee of ExxonMobil; he resides in Texas.
- f. Rick McGovern is a former employee of ExxonMobil; he resides in Texas.
- g. Tanya Miller is a former employee of ExxonMobil; she resides in Texas.
- h. Ozgur Ozen is a current employee of ExxonMobil; he resides in Texas.
- i. Charles Tautfest is a current employee of ExxonMobil; he resides in Texas.
- j. Alejandro Tello is a current employee of ExxonMobil; he resides in Texas.

9. It is my understanding that, in addition to individuals identified in Gulden’s and Burch’s disclosures, ExxonMobil identified the following individuals as persons likely to have discoverable information.

- a. Robert Heinle is a current employee of ExxonMobil; he resides in Texas.

b. Richard Igercich is a former employee of ExxonMobil; while employed, Mr. Igercich resided in Texas. Upon information and belief, Mr. Igercich currently resides in Virginia.

c. Adam Ostridge is a current employee of ExxonMobil; he resides in Texas.

10. Relevant records relating to Gulden's and Burch's employment, including, without limitation, employee personnel files, employee compensation records, policies and procedures, and corporate communications, were created in Texas and the custodians of those records reside in Texas.

By:   
Beth E. Casteel

Dated: October 8, 2024